

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED  
APR 26 2017  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALDIN AHMETASEVIC,

Defendant.

No

**4:17CR00179 CDP/NAB**

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**[Conspiracy to Commit Bank Fraud]**

1. Beginning at a time unknown to the Grand Jury but at least as early as July 2012, and continuing through at least September, 2015, in the Eastern District of Missouri and elsewhere, the defendant,

**ALDIN AHMETASEVIC,**

did knowingly and willfully combine, conspire, confederate and agree with others known and unknown to the Grand Jury, to commit the following offense against the United States, to wit:

- a. did knowingly execute and attempt to execute a scheme or artifice to defraud and to obtain money, funds, credits, assets, securities owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

### **GENERAL ALLEGATIONS**

At all times relevant to this Indictment, Fortune Bank, BMW Financial Services, and First Missouri Credit Union (the "Financial Institutions") were financial institutions within the meaning of Title 18, United States Code, Section 20 because they were insured depository institutions as defined in Title 12, United States Code, Section 1813(c)(2).

### **MANNER AND MEANS OF THE CONSPIRACY**

2. The manner and means of the scheme and conspiracy are further described as follows:

It was part of the scheme and conspiracy that Aldin Ahmetasevic and a coconspirator, engaged in a pattern of fraud in which they:

- A. purchased expensive vehicles with loans they obtained by submitting false claims about income;
- B. defaulted on the vehicle loans;
- C. caused false and fraudulent lien releases to be submitted to state agencies responsible for registration and titling of motor vehicles; and
- D. then selling the vehicles for a profit.

3. In July 2012, Aldin Ahmetasevic obtained an \$82,054.65 loan from Fortune Bank to purchase a 2004 Freightliner semi-truck, VIN: 1FUJA6CG84LM22009(hereinafter referred to as a "2004 Freightliner"), and a white 2006 Range Rover, VIN: SALSH23416A960192 (hereinafter referred to as a "white 2006 Range Rover").

4. In August 2012, Aldin Ahmetasevic caused both vehicles to be registered to him in Missouri with Fortune Bank identified as the lien holder.

5. In November 2012, Aldin Ahmetasevic obtained an \$83,370.48 loan from the Fortune Bank that included the balance of the existing loan identified in paragraph 3 above for the 2004 Freightliner and the white 2006 Range Rover and additional funds to have the 2004 Freightliner repaired.

6. Aldin Ahmetasevic made his last monthly payment on the \$83,370.48 loan in April 2014.

7. On November 18, 2014 Aldin Ahmetasevic sold the 2004 Freightliner to "The World of Trucks," a business located in Florida.

8. Fortune Bank employees began efforts to repossess the two vehicles and learned that Aldin Ahmetasevic had acquired a black 2012 Range Rover VIN: SALSP2E42CA745271 (hereinafter referred to as a "black 2012 Range Rover").

9. On or about December 2, 2014, a false and fraudulent release of lien for the white 2006 Range Rover was filed with the Illinois Secretary of State stating that the lien on the white 2006 Range Rover had been released effective May 29, 2013.

10. In January, 2015, Aldin Ahmetasevic and a coconspirator inquired about the black 2012 Range Rover that a dealership had advertised for sale on the internet. During their discussions with the dealer, Aldin Ahmetasevic and a coconspirator indicated that they would be trading in the white 2006 Range Rover.

11. On or about January 10, 2015, a coconspirator applied for a loan from BMW Financial Services, 5550 Britton Parkway, Hilliard, Ohio 43026, to purchase the black 2012 Range Rover, VIN: SALSP2E42CA745271, from Perillo BMW.

12. On the loan application, a coconspirator falsely and fraudulently stated she was employed as a pharmacist at West Pine Pharmacy and was earning \$96,000 a year.

13. On January 15, 2015, the white 2006 Range Rover was transferred to Speed Global LLC, d.b.a. Gold Coast Bentley (Speed Global), 834 North Rush Street, Chicago, Illinois 60611. Since Speed Global could not finance the purchase of the black 2012 Range Rover, the dealership transferred ownership of it to a sister dealership, Perillo BMW, 1035 North Clark Street, Chicago, Illinois 60610.

14. On the basis of the false and fraudulent information which a coconspirator provided on her loan application, BMW Financial Services approved the loan and the black 2012 Range Rover was purchased for \$67,959.18. Perillo BMW applied a \$15,000 down payment credit for the proceeds of the sale of the white 2006 Range Rover.

15. On or about March 11, 2015, Perillo BMW mailed a coconspirator a refund check in the amount of \$1,157 for overpayment for the black 2012 Range Rover.

16. On or about March 19, 2015, a coconspirator endorsed the check and deposited it into the joint Pulaski Bank account she shares with Aldin Ahmetasevic.

17. On or about April 20, 2015, a coconspirator applied for a refinance loan for the black 2012 Range Rover from First Missouri Credit Union, 1690 Lemay Ferry Road, St. Louis, Missouri 63125. On the loan application, a coconspirator stated she was employed as a pharmacist at West Pine Pharmacy in St. Louis and was earning \$75,000 a year. A coconspirator also submitted a false and fraudulent form W2 statement that identified her 2014 income from West Pine Pharmacy as \$73,853.59.

18. On the basis of the false and fraudulent information a coconspirator provided on her loan application, First Missouri Credit Union approved the loan and mailed a check for \$51,413.00 to BMW Financial Services in Arizona to pay off the existing loan on the black 2012 Range Rover.

19. On April 28, 2015, BMW Financial Services mailed a letter to First Missouri Credit Union releasing the lien on the 2012 Range Rover.

All in violation of 18 U.S.C. § 1349.

**FORFEITURE ALLEGATION**

20. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of a conspiracy to violate of Title 18, United States Code, Section 1344 as set forth in Count One, the Defendants shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense.

21. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

22. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

CARRIE COSTANTIN  
Acting United States Attorney

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Assistant United States Attorney